

LEASON ELLIS

September 5, 2019

**VIA ECF**

Hon. Edgardo Ramos  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007  
New York, NY 10007

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RE: *Tianhai Lace USA, Inc. v. Lord & Taylor LLC et al.*  
Case No.: 19-cv-06016-ER

Dear Judge Ramos:

We are counsel for Plaintiff Tianhai Lace USA, Inc. (“Tianhai”) in the above-referenced case against Defendants Lord & Taylor LLC (“L&T”) and The Levy Group, Inc. (“Levy Group”). Pursuant to § 1(E) of your individual rules of practice, we write to request a second extension of time for the Defendants to plead or otherwise respond to the Complaint. The current deadline for Defendants to file a response to the Complaint is today, September 5, 2019. *See Dkt. 13*. The Defendants consent to this request and the Parties believe that judicial economy will be served by the requested extension for the following reasons.

This is a copyright infringement dispute involving a lace garment supplied by Levy Group to L&T. Following the grant of the first extension, the parties engaged in settlement discussions during which Levy Group indicated that it would provide additional information about the disposition of the allegedly infringing garments in order to facilitate settlement of the case. The Parties believe that the additional disclosures may progress settlement discussions to the point of resolving this case without further proceedings or additional parties. Defendants have agreed to provide such disclosures, but require additional time to collect, review, and produce the requested data. Granting this request will have no effect on any other deadlines in this case as none have been set.

Wherefore, the Parties respectfully request that the Court permit Defendants L&T and Levy Group until Monday, November 4, 2019 to plead or otherwise respond to the Complaint.

Respectfully submitted,



Cameron S. Reuber